

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

THREE DURANS, LLC,

Civil Action No.: 2:20-cv-01881

Plaintiff,

Honorable Robert C. Colville

vs.

COUNTY OF ALLEGHENY, a political
subdivision of the Commonwealth of
Pennsylvania, the ALLEGHENY
COUNTY HEALTH DEPARTMENT,
THE PENNSYLVANIA LIQUOR
BOARD and the BOROUGH OF
CARNEGIE POLICE DEPARTMENT,

JURY TRIAL DEMANDED

Defendants.

DEFENDANT BOROUGH OF CARNEGIE POLICE DEPARTMENT'S
MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE
PLEADING TO PLAINTIFF'S AMENDED COMPLAINT

Pursuant to Local Rule 7.E., the Defendant Borough of Carnegie Police Department submits the following Motion for Extension of Time for Defendant Borough of Carnegie Police Department to file a responsive pleading to Plaintiff's Amended Complaint:

1. On March 12, 2021, Plaintiff filed an Amended Complaint. A responsive pleading is due on April 12, 2021.

2. The undersigned counsel for Defendant Borough of Carnegie Police Department has had recent due dates for other pleadings and court filings, as well as other legal commitments, which have interfered with his preparation of a responsive pleading to the Amended Complaint. As a result, he believes that a brief extension in the time to file a responsive pleading to the Amended Complaint is necessary in order to effectively represent his client.

3. Counsel for all the parties have agreed to the undersigned's request for an extension of the deadline for Defendant Borough of Carnegie Police Department to file a responsive pleading to Plaintiff's Amended Complaint until April 19, 2021.

WHEREFORE, it is respectfully requested that Defendant Borough of Carnegie Police Department be given a one week extension to file a responsive pleading to the Amended Complaint.

Date: April 8, 2021

Respectfully submitted,

MARGOLIS EDELSTEIN

/s/ Charles H. Saul

Charles H. Saul, Esquire
PA I.D. No. 19938
csaul@margolisedelstein.com

/s/ Kyle T. McGee

Kyle T. McGee, Esquire
kmcgee@margolisedelstein.com
PA I.D. No. 205661
Henry W. Oliver Building, Suite 1100
535 Smithfield Street
Pittsburgh, PA 15222
Phone: 412-355-4961 / 412-355-4971
(Counsel for Defendant Borough of Carnegie
Police Department)